



**UNITED STATES ENVIRONMENTAL PROTECTION AGENCY**

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November 21, 2011

Rodney N. Barry, P.E.  
Division Administrator  
Federal Highway Administration  
Georgia Division  
61 Forsyth Street, SW  
Suite 17T100  
Atlanta, Georgia 30303-3104

**SUBJECT:** Final Environmental Impact Statement/Alternatives Analysis for the Northwest I-75/I-575 Corridor Project in Cobb and Cherokee Counties, Georgia

Dear Mr. Barry:

The U.S. Environmental Protection Agency (EPA) has reviewed the referenced Final Environmental Impact Statement (FEIS) in accordance with its responsibilities under Section 309 of the Clean Air Act and Section 102(2)(C) of the National Environmental Policy Act (NEPA). The Georgia Department of Transportation (GDOT) and the Federal Highway Administration (FHWA) propose to make transportation improvements to I-75 and I-575 in the northwest corridor in the Atlanta metropolitan area in Cobb and Cherokee Counties, Georgia. The proposed managed lanes would extend from the current end of the high-occupancy vehicle (HOV) lanes on I-75 at Akers Mill Road south of I-285. Two new reversible managed lanes would be constructed between I-285 and I-575. A single reversible lane would be constructed on I-75 from I-75/I-575 Interchange to north of Hickory Grove Road. Similarly, a single reversible lane would be constructed on I-575 between the I-75/I-575 Interchange and Sixes Road. The total length of highway corridor improvements is 29.7 miles.

The alternatives considered included the no-build alternative; an HOV/Truck-Only-Lane (TOL) alternative; an HOV/TOL/Transportation System Management alternative; an HOV/TOL/Bus Rapid Transit (BRT) alternative; and an HOV/TOL/Reduced BRT alternative. All build alternatives provide for the extension of the HOV lanes on I-75 and I-575 and the addition of TOL on I-75. In addition to the design options, two operational options were considered for the build alternatives, which include High-Occupancy-Toll Lane (HOT) Option that would allow single-occupancy vehicles use of the HOV lanes by paying a toll and Truck-Only-Toll Lane (TOT) Option that would require truck operators to pay a toll (either mandatorily or voluntarily).

In 2008, GDOT decided to eliminate the TOL and the BRT elements of the build alternatives evaluated in the DEIS, leaving only the HOV lane element of the project and opted to analyze three concepts in the FEIS. Concept A, which is a two lane bi-directional HOV

system operating on I-75 between I-285 and I-575, and a single bi-directional HOV system northwards to Hickory Grove Road on I-75 and Sixes Road on I-575. Concept B consisting of two reversible (one-direction) lanes operating on I-75 between I-285 and I-575, and single reversible lanes northwards to Hickory Grove Road on I-75 and Sixes Road on I-575. Concept C consisting of three reversible lanes operating on I-75 between I-285 and I-575, two reversible lanes both I-75 and I-575 north to Big Shanty road, and a single reversible lane further north of Hickory Grove Road on I-75 and Sixes Road on I-575.

Concept A was eliminated from further consideration because bi-directional lanes would result in unused capacity in the off-peak direction flow. Concept C was eliminated because of the additional cost of constructing a third lane on I-75 between I-285 and I-575. GDOT concluded that both Concept A and C had higher environmental impacts as compared to B. GDOT identified Concept B as the most appropriate design concept in order to meet the cost effectiveness and affordability goal of the study.

Preferred Alternative, Concept B, includes all proposed transportation facilities and services considered part of the No-Build Alternative, plus the additional proposed improvements for both I-75 and I-575. The Preferred Alternative would extend the two I-75 managed lanes (HOV lanes, one in each direction) that currently terminate at Akers Mill Road south of the I-75/I-575 interchange. The two new managed lanes would extend north on I-75 from the I-75/I-575 interchange to just beyond Hickory Grove Road. Similarly, a single managed lane would continue north on I-575 interchange. A single managed lane would continue north on I-75 from the I-75/I-575 interchange to just beyond Hickory Grove interchange to the Sixes Road interchange. The proposed managed-lane facility includes improvements of approximately 16.8 miles on I-75, 11.3 miles on I-575, and 1.6 miles on I-285. The proposed 29.7 miles of new managed lanes would be designed for highway speeds of 55 miles per hour (mph) on I-75 between I-285 and I-575 and 65 mph on each corridor north of the I-75/I-575 interchange. The ramps connecting the I-75 managed lanes to I-285 would be designed for 45 mph.

Based on our review of the FEIS, EPA's environmental concern were related to the following areas: the full consideration of alternatives, air impacts (air emissions and lack of analysis for mobile source air toxics (MSATs)), environmental justice and noise impacts.

### **Range of Alternatives:**

EPA previously commented on this project's Draft Environmental Impact Statement (DEIS) on August 13, 2007. As previously stated in our DEIS letter, EPA remains concerned that a full analysis of alternatives (in Section 2) was not conducted. The Light Rail Transit alternative was eliminated early on from further consideration by the Northwest Connectivity Study based on cost and cost effectiveness criteria. EPA requested further alternatives analysis in the FEIS, but Section 2 remains insufficient in thoroughly analyzing and discussing the full range of alternatives. As previously stated, rail transit services to Cobb and Cherokee Counties would be inherently cleaner, alleviate congestion along the I-75 corridor and serve to reduce air toxic emissions from cars and trucks.

In light of this, EPA continues to recommend consideration for design of the preferred alternative to allow for upgrade to rail modes in the future when air quality considerations, energy costs, capacity needs, etc. warrant it.

### **Air Impacts:**

EPA provided extensive MSATs comments in our DEIS letter for this project. The sponsors acknowledge that the project falls within the Tier 3 category established by the Federal Highway Administration (FHWA), i.e., projects with a high potential for mobile source air toxic effects in a populated area. Projects in this category should be rigorously and quantitatively assessed to compare alternatives as noted in the “Interim Guidance on Air Toxic Analysis in NEPA Documents” issued by the FHWA in 2006.

The limited air toxics analysis that has been done for this project led the sponsors to acknowledge, “that the alternatives could increase exposure to MSAT (mobile source air toxic) emissions in certain locations, although the concentrations and duration of exposures are uncertain.” This is important since air toxics are a local concern and their concentrations can vary significantly over short distances. For this reason, we have called for modeling of concentrations at several locations where people might be exposed. Based on these estimated concentrations, a screening level risk comparison should be developed to better inform the consideration of each alternative’s potential impacts.

GDOT and FHWA propose instituting an Express Toll Lane (ETL) policy where the new managed lanes will require all HOV (except certain exempted vehicles) to pay a toll. EPA is concerned that the ETL policy combined with the removal of HOV lanes will discourage commuters from carpooling, which might increase air emissions. For example, the recent I-85 HOV to HOT lane project appears to have increased congestion and the effectiveness of the project is in question. EPA encourages GDOT to continue to monitor the effectiveness of the I-85 HOV to HOT lane project and apply appropriate lessons learned to the Northwest Corridor Project. EPA also encourages GDOT and FHWA to exam the air emission impact of this option. Further, EPA recommends that GDOT re-consider this strategy and allow HOV 2+ to use the managed lanes without paying a toll.

### **Environmental Justice:**

We appreciate GDOT’s efforts in outlining possible mitigation tolling measures for Environmental Justice (EJ) communities (Environmental Commitments Table No. 14, Volume 1a). We also recognize that the Preferred Alternative requires much less direct impacts to EJ communities as compared to other alternatives listed in the DEIS. However, EPA remains concerned that EJ communities will be disproportionately impacted by this project. GDOT states that the Preferred Alternative would require the acquisition of 44 parcels of land that consist of 58% low income or minority communities (page 5-30, 5.6.2.2 Property Acquisitions, Volume 1a). Most of these purchases would not require displacement; however, all the displacements

(six residences and 12 businesses) consist of low income or minority people. As requested in our DEIS comment letter, EPA continues to request that GDOT mitigate for these adverse community impacts, EPA strongly recommends development of a comprehensive mitigation and enhancement plan for these neighborhoods to address displacement concerns and preserve the cohesiveness of these communities. EPA recommends that the plan include commitments to continue working with these communities to assist with relocation and redevelopment activities. The plan should also identify the extent to which toll revenues and toll discounts will be used to improve mobility and equity for disadvantaged populations.

**Noise Impacts:**

The FEIS indicates that the Preferred Alternative will impact 1,977 receptors along I-75 and 158 receptors along I-575. GDOT and FHWA propose constructing sound barriers along I-75 at a cost of \$20.7 Million and along I-575 at a cost of \$13 Million. Additionally, GDOT proposes in the FEIS to have the Public Private Partnership (P3) pay for the cost of these sound barriers, but this is not specifically listed in the Environmental Commitments table (Page EC-3). Environmental Commitment No. 10 (Page EC-3, Volume 1a) states, "A final decision on the installation of sound barriers will be made upon completion of additional detailed noise abatement analysis based on final decision and public outreach to affected property owners. Coordination with property owners regarding the location of potential sound barriers will be conducted prior to the final decision on the installation of the sound barriers. Public involvement will be conducted in accordance with the approved public involvement plan for the project." EPA acknowledges GDOT's efforts in coordinating and outreaching to impacted communities; however, EPA is concerned that the construction of appropriate sound barriers might not be implemented by the P3 because of a lack of explicit commitment. EPA recommends that GDOT further strengthen their commitment to the impacted communities by clearly stating that coordination with the community and impacted property owners will continue and specific commitments to construct sound barriers to mitigate for noise will be included in the Record of Decision (ROD). Additionally, EPA requests a copy of the ROD.

We appreciate the opportunity to review the proposed action. Please contact Jamie Higgins at (404) 562-9681 if you want to discuss our comments.

Sincerely,



Heinz J. Mueller, Chief  
NEPA Program Office  
Office of Policy and Management

cc: Glenn Bowman – Georgia Department of Transportation